

UNITED STATES DEPARTMENT OF AGRICULTURE
FOOD SAFETY AND INSPECTION SERVICE
WASHINGTON, DC

FSIS NOTICE

64-06

9/28/06

ANSWERS TO QUESTIONS RELATED TO THE CERTIFICATION FOR EXPORT OF INTESTINES OR ANIMAL CASINGS (FSIS NOTICE 34-06)

This notice provides answers to questions FSIS has received regarding FSIS Notice 34-06, Certification of Intestines or Animal Casings for Export.

Q1. The Notice uses the terms “intestines” and “casings.” Are there differences in inspection requirements for the products when the different product names are used, or can the terms be used interchangeably?

A1. There are differences in inspection requirements and Agency jurisdiction between products labeled intestines and products labeled “casings”. Products labeled as “(species) intestines” are derived from the intestinal tract of animals and are meat byproducts. As meat byproducts, intestines are under FSIS jurisdiction. Therefore, they are required to be produced under FSIS inspection and are eligible to bear the mark of inspection. Intestines may be labeled as “(species) intestines for casings” when they are intended for further preparation into casings.

Products labeled as “(species) casings” are derived from the intestines of animals and are used as containers to prepare sausage and other meat food products. Casings are under the jurisdiction of the Food and Drug Administration (FDA) and normally do not bear the mark of inspection. Facilities may request voluntary reimbursable service under 9 CFR Part 350 to prepare casings under inspection, thus making them eligible to bear the mark of inspection.

Note: Beef distal ileum is a specified risk material (SRM) in all ages of cattle and must be disposed according to 9 CFR 310.22 (a) (3).

Q2. Are animal casings used in preparing meat or poultry food products in federally inspected establishments required to bear the USDA mark of inspection after the 7/17/06 implementation date of FSIS Notice 34-06?

A2. No. The notice did not change any policy regarding the use of natural casings when preparing other inspected products. Casings used to make meat or poultry food

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products in federally inspected establishments are not required to bear the USDA mark of inspection because natural animal casings are regulated by FDA as containers. Casings used in preparing meat and poultry in federally inspected establishments must comply with 9 CFR 318.6 (b) (1), (2), and (3).

Q3. Does FSIS Notice 34-06 apply to any portion of the animal digestive tract used to produce casings?

A3. Yes. FSIS may certify for export any part of the digestive tract of an animal slaughtered under USDA inspection if it bears the mark of inspection.

Q4. Are non-official establishments able to process intestines (for preparation into casings) and casings for export as a FDA product after 7/17/2006?

A4. Yes, as FDA products

Q5. If another firm leases a non-inspected room in a federally inspected establishment, could it process intestines into casings for export certification under voluntary reimbursable inspection in that room?

A5. Yes, the firm may request voluntary reimbursable service to provide inspection for casings processing under 9 CFR 350.3, in order to apply the USDA mark of inspection to the casings. As mentioned above, FDA regulates casings. Therefore, when firms request the USDA mark of inspection for export certification of casings, the processing and preparation of them is a reimbursable service under 9 CFR Part 350. The firm requesting the voluntary reimbursable service for preparing the casings must apply to, and be approved for the service by the district manager (DM) using FSIS Form 5200-6 (see FSIS Directive 12,600.1, Revision 1). The DM may assign a separate number for the voluntary service, or the firm may use the same number as the establishment in which it operates.

Q6. If a U.S. slaughter establishment harvests intestines from animals that have passed antemortem and postmortem inspection at the establishment, can the establishment ship the partially cleaned intestines, without the mark of inspection, to a second establishment for further processing into casings that will be certified later for export?

A6. Yes, a slaughter establishment can harvest intestines from animals that have passed antemortem and postmortem inspection and ship those intestines only partially cleaned to another facility or establishment for further preparation into casings. However, these intestines must be inspected at the second establishment and bear the marks of inspection in order for FSIS to certify them for export. If the establishment does so, it is necessary that it maintain appropriate records clearly identifying the product as harvested from inspected and passed animals and control the shipment of product to the other facility. Copies of the records must accompany the shipment of the product in order to maintain its identity. Establishments may use company seals or have the product move under FSIS control (e.g., USDA seal, accompanied by FSIS Form 7350-1) while it is in transit. Labels for these intestines should bear a statement of limited use designating what is being done to them and their destination for further processing.

Q7. Who is responsible for costs involved in export certification of casings and intestines?

A7. The firm requesting the export certification is responsible for the expenses associated with export certification.

Q8. Are HACCP plans required for preparing casings as food articles under 9 CFR Part 350?

A8. No, preparing casings under Part 350 is a voluntary reimbursable service, which does not require a HACCP plan. Inspection personnel are responsible for verifying that the product produced is not adulterated, and that the facilities meet the sanitary performance standards outlined in 9 CFR 416.1-6. For additional information on voluntary reimbursable services, see FSIS Directive 12,600.1. In contrast, intestines labeled as “(species) intestines” are meat by-products. Therefore, if an establishment prepares and labels “(species) intestines”, that process needs to be considered in the establishment’s hazard analysis, and any hazards reasonably likely to occur must be addressed in its HACCP plan.

Q9. Do labels for “(species) casings” prepared under voluntary reimbursable service (9 CFR Part 350) and intended for export need to be approved by FSIS, i.e., the Labeling and Consumer and Protection Staff (LCPS)?

A9. Yes. Companies need to submit labels for “(species) casings” prepared under 9 CFR Part 350 for export to LCPS for approval. Deviations from domestic labeling rules are permitted in accordance with 9 CFR 317.7. The label application should contain documentation that supports the receiving country’s acceptance of the deviation.

Direct additional questions to IEIS, OPPED at (202) 205-0010.



Assistant Administrator
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